

13 cv 2839 JNK/FCN

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
COURT FILE NO.:

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NOV 22 2013

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA
COMPLAINT

DALE MONTGOMERY

Plaintiff,

V.

Pinnacle Credit Services et al

WITH JURY TRIAL

DEMAND

MOTION FOR ENTRY OF DEFAULT JUDGEMENT

TO THE HONORABLE JUDGE OF THIS COURT.

The plaintiff Dale Montgomery, comes before this court with this Motion for Entry of Default Judgment against Defendant Dynamic Recovery Services, and states as follows:

1. I am the Prose Plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter. Plaintiff has made all filings required by this court to bring a cause of action against the Defendant Dynamic Recovery Services, for damages under the FCRA 15 USC 1681 et seq, Telephone Consumer Practices ACT 47 U.S.C. §227(b)(3)(A), FDCPA, 15 U.S.C. §1692, MFDCPA 332.33-355- 332.37
2. Plaintiff has made proper service of the summons and complaint to the defendant Dynamic Recovery Services as evidenced by the proof of mailing.
3. The time for the defendant to respond is past and there has been no response to the service of summons and complaint in this matter and defendant is therefore in default.

SCANNED

NOV 22 2013

U.S. DISTRICT COURT ST. PAUL

[Signature]

4. Plaintiff has made a request for Clerks entry of default judgment and it was granted on November 21, 2013.

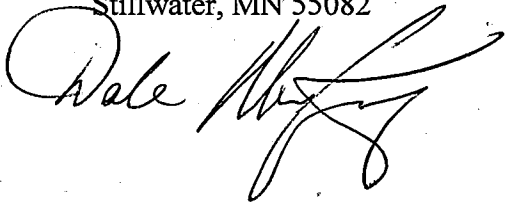
Wherefore, the Plaintiff respectfully moves the court to enter an order of default judgment against the defendant, Dynamic Recovery Services in the amount of \$8000 for statutory damages as well as the cost to bring this action as stated in the annexed bill of cost and for which let execution issue.

Respectfully Submitted

Dale Montgomery

12131 Paris Ave N

Stillwater, MN 55082

A handwritten signature in cursive script, appearing to read "Dale Montgomery", is written over the printed name and address.

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DALE MONTGOMERY

Plaintiff,

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COMPLAINT

WITH JURY TRIAL

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STATEMENT OF COST INCURRED BY PLAINTIFF

CLERKS FEE FOR FILING COMPLAINT \$400.00

COST OF SERVICE OF SUMMONS AND COMPLAINT \$

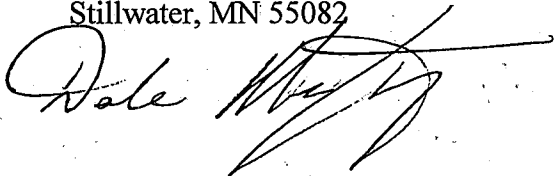
TOTAL COST INCURRED \$

Respectfully Submitted

Dale Montgomery

12131 Paris Ave N

Stillwater, MN 55082

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